

**From:** [Craig Ziady](#)  
**To:** [Casey, Carolyn](#)  
**Subject:** RE: Cummings Center, Beverly, MA/former USM site IDA  
**Date:** Tuesday, January 07, 2014 5:05:35 PM

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Hi Carolyn – Happy new year. I am going to try to get you a detailed response this week.  
Thanks very much.

Craig

*Craig J. Ziady*

*General Counsel*

*Cummings Properties, LLC*

*Direct dial: 781-932-7034*

*Main No.: 781-935-8000*

[www.cummings.com](http://www.cummings.com)

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**From:** Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

**Sent:** Thursday, December 05, 2013 9:10 AM

**To:** Craig Ziady

**Cc:** 'Bruce Hoskins'; 'Steve Drohosky'

**Subject:** RE: Cummings Center, Beverly, MA/former USM site IDA

I did have a nice Thanksgiving, hope you all did as well.

The only attachment that was not included in the 9/30/13 email was Attachment 1 which is Figure 5 Phase II Comprehensive Site Assessment June 1991. Its attached here. Sorry for the delay in sending.

Please provide me with as much notice as possible prior to any additional sampling.

Do you have an idea of when the response will be submitted?

Thanks you for the update.

Carolyn

[Carolyn J. Casey](#)

RCRA Facility Manager

U.S. EPA

5 Post Office Square, Suite 100

mail code OSRR 07-3

Boston, MA 02109-3912

phone 617-918-1368

fax 617-918-0368

[casey.carolyn@epa.gov](mailto:casey.carolyn@epa.gov)

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**From:** Craig Ziady [<mailto:craig@cummings.com>]

**Sent:** Wednesday, December 04, 2013 11:43 AM

**To:** Casey, Carolyn

**Cc:** 'Bruce Hoskins'; 'Steve Drohosky'

**Subject:** RE: Cummings Center, Beverly, MA/former USM site IDA

Hi Carolyn – Thanks for checking in. Hope you had a nice Thanksgiving.

Yes, we are putting together a response to the technical review comments, including additional sampling results, though we have still not heard back from your office with regard to the “attachments” that were referenced in but not attached to your previous email. Could you please send those to me so we can assess all of your comments in context?

Thanks in advance.

Craig

*Craig J. Ziady*

*General Counsel*

*Cummings Properties, LLC*

*Direct dial: 781-932-7034*

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**From:** Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

**Sent:** Tuesday, December 03, 2013 3:52 PM

**To:** Craig Ziady

**Cc:** Wainberg, Daniel; Johnson, Stephen (DEP); Stephen Drohosky; Bruce Hoskins

**Subject:** FW: Cummings Center, Beverly, MA/former USM site IDA

Could you please provide an update related to the email below? I have not heard anything since the comments went out in September. Did any IDA sampling take place since then? Is a first or second round planned for this winter?

Thanks

Carolyn

Carolyn J. Casey

RCRA Facility Manager

U.S. EPA

5 Post Office Square, Suite 100

mail code OSRR 07-3

Boston, MA 02109-3912

phone 617-918-1368

fax 617-918-0368

[casey.carolyn@epa.gov](mailto:casey.carolyn@epa.gov)

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**From:** Casey, Carolyn

**Sent:** Monday, September 30, 2013 1:35 PM

**To:** 'Craig Ziady'

**Cc:** 'Bruce Hoskins'; 'Stephen Drohosky'; 'Johnson, Stephen (DEP)'; 'Miano, John (DEP)'; Wainberg, Daniel; 'Donahue, Patricia (DEP)'

**Subject:** RE: Cummings Center, Beverly, MA/former USM site IDA

Please see the attached technical review comments on the indoor air sampling. I do not have attachment 1 but will send it along ASAP.

Thanks

Carolyn

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**From:** Casey, Carolyn

**Sent:** Thursday, September 19, 2013 2:52 PM

**To:** 'Craig Ziady'

**Cc:** 'Bruce Hoskins'; 'Stephen Drohosky'; 'Johnson, Stephen (DEP)'; 'Miano, John (DEP)'; Wainberg, Daniel

**Subject:** FW: Cummings Center, Beverly, MA/former USM site IDA

As a follow-up to the attached email, below, I just spoke with Jack Miano from the Mass DEP and based on his review of the additional older soil gas sampling data from the 2008 AUL addendum and the indoor air data, it does appear as though the primary concern from a risk perspective is with the petroleum fractions.

We also discussed the need for an additional round of indoor air sampling as soon as possible to evaluate any changes since the modification of the ventilation system. Another round of IDA sampling is needed in the winter. Soil gas sampling should also be conducted immediately following the indoor air sampling, consistent with the VI guidance. Despite the above evaluation, the next two rounds should include both the petroleum fractions and TO-15.

Also, an ambient outdoor air sample should be collected in the same location as before but also a sample should be placed between the gas station located off-site to the east of Bldg 100 and bldg 100. Another ambient air sample could be placed near the ponds/wooded area, away from all the cars, etc.

Please let me know if we need to discuss this further on a conference call with DEP.

Thanks

Carolyn

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**From:** Casey, Carolyn

**Sent:** Wednesday, August 28, 2013 3:11 PM

**To:** 'Craig Ziady'

**Cc:** 'Bruce Hoskins'; 'Stephen Drohosky'

**Subject:** RE: Cummings Center, Beverly, MA

Summer has been enjoyable but much too short. Hope you have all had the chance for some vacation and are all enjoying the summer as well.

I was recently looking for the 2008 AUL amendment and cannot find the appendices which includes the figures, table and lab reports. Is there some reason this was not submitted to the DEP in electronic format? May have been prior to when they started requiring electronic files. Nonetheless, I cannot find it scanned in to the system so maybe it's buried in another document. I did just see a paper copy that the DEP has in Wilmington but it appear to be mixed in with the 2006 amendment and could be missing information. Do you have a complete electronic version that can be submitted to DEP and could you also please send me a copy too? If not, could you please send me a paper copy.

Regarding the sampling frequency and/or time of year to sample, I would suggest using the MA DEP guidance. Sampling under the most conservative conditions would be in the winter but considering the sensitive population, guidance suggests more frequent sampling. The following is cut and pasted

from 12/11 MassDEP VI Guidance....

<b>Table 2-1: Conditions for Sampling Indoor Air</b>	<b>Most Conservative Conditions</b>	<b>Least Conservative Conditions</b>
<b>Parameter</b>		
<b>Season</b>	Late winter/early spring	Summer
<b>Temperature</b>	Indoor 10°F > than outdoors	Indoor temp < outdoor temp.
<b>Wind</b>	Steady, > ~5 mph	Calm
<b>Soil</b>	Saturated with rain or frozen	Dry
<b>Groundwater</b>	High water table	Low water table
<b>Pressure</b>	Indoor > Outdoor	Indoor < Outdoor
<b>Doors/Windows</b>	Closed	Open
<b>Heating System</b>	Operating	Off

MassDEP recommends greater sampling frequency for more sensitive receptors. For daycares, schools, and residences, MassDEP recommends that at least two to four indoor air sampling rounds be conducted, depending on the degree of subsurface contamination, before determining that the vapor intrusion pathway does not exist. For commercial and industrial buildings, two indoor air sampling rounds are recommended to provide sufficient information to make decisions regarding vapor intrusion. In order to obtain an estimate of long-term conditions (chronic exposure), the sampling rounds should be obtained over at least two different seasons, one of which is winter.

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**From:** Craig Ziady [<mailto:craig@cummings.com>]

**Sent:** Friday, August 23, 2013 12:43 PM

**To:** Casey, Carolyn

**Cc:** 'Bruce Hoskins'; 'Stephen Drohosky'

**Subject:** Cummings Center, Beverly, MA

Hi Carolyn – I hope you are enjoying the summer. In response to your recent email relating to Cummings Center, we submit the following:

Our information and documents reveal that several tanks, including tank T19, appear to have been removed sometime between 1988 and 1991. Although we have not been able to locate any contemporaneous documentation regarding the removal, this fact is not terribly surprising given that the removal not only predated the implementation of licensed site professionals but also occurred outside of the Massachusetts Contingency Plan process. We anticipated that we might be able to locate records of the removal at the Beverly Fire Department, but BFD had no such records. We also tried at the Beverly Historical Society, but we had no luck there either.

Your question about the HVAC system prompted us to re-survey the system in and around Suite 157-J. In doing so, we discovered that most of the fresh air for the heat pump units serving Suite 157-J came from an air intake located on the first floor of the West elevation, directly at the truck loading dock outside of Suite 159J. Since the HVAC system does not allow for such air intake to be selectively turned off without disrupting the system, we decided to vertically re-route the system this month so that the fresh air intake now draws fresh air at rooftop-level (i.e., instead of from the truck loading dock).

Given the foregoing, including particularly the relocation of the air intake serving Suite 157-J, we intend to resample the indoor air at Suite 157-J, likely by repeating the 24-hour composite event, before we determine if any sub-slab sampling is advisable. Do you have a particular preference on the time of year that such resample takes place?

Thanks very much.

Craig  
*Craig J. Ziady*  
*General Counsel*  
*Cummings Properties, LLC*  
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